CHAITMAN LLP

Helen Davis Chaitman helen Davis Chaitman helen Davis Chaitman

465 Park Avenue

New York, New York 10022 Phone & Fax: 888-759-1114

Attorneys for Defendant Robert Roman

Presentment Date: August 7, 2020 12:00 PM

Objection Date: July 31, 2020

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ROBERT ROMAN,

Defendant.

SIPA LIQUIDATION

Adv. Pro. No. 08-01789 (SMB)

(Substantively Consolidated)

Adv. Pro. No. 10-04292 (SMB)

NOTICE OF PRESENTMENT OF AN ORDER GRANTING APPLICATION TO WITHDRAW AS COUNSEL

PLEASE TAKE NOTICE that, upon the annexed Declaration of Helen Davis Chaitman in Support of Application to Withdraw as Counsel, dated July 17, 2020 Chaitman LLP, attorney of record for Defendant, Robert Roman, (the "Defendant") in the above Adversary Proceeding,

will present the attached proposed order to the Honorable Stuart M. Bernstein, United States

Bankruptcy Judge at the United States Bankruptcy Court for the Southern District of New York at

One Bowling Green, New York, NY 10004, for signature on August 7, 2020 at 12:00 PM.

PLEASE TAKE FURTHER NOTICE that unless a written objection to the proposed

order, with proof of service, is filed with the Clerk of the Court and copies of such objection are

served so as to be delivered to the undersigned, along with counsel to the Trustee, and a courtesy

copy is delivered to the Bankruptcy Judge's chambers at least three days before the date of

presentment, there will not be a hearing and the order may be signed.

PLEASE TAKE FURTHER NOTICE that if a written objection is timely filed, the

Court will notify the moving and objecting parties of the date and time of the hearing and of the

moving party's obligation to notify all other parties entitled to receive notice. The moving and

objecting parties are required to attend the hearing, and failure to attend in person or by counsel

may result in relief being granted or denied upon default.

Dated: July 17, 2020

New York, New York

CHAITMAN LLP

By: /s/ Helen Davis Chaitman

Helen Davis Chaitman

hchaitman@chaitmanllp.com

465 Park Avenue

New York, New York 10022

Phone & Fax: 888-759-1114

Attorneys for Defendant Robert Roman